

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: LADY FOREST FARMS, INC.  
Debtor**

**CHAPTER 11  
CASE NO. 11-01259-NPO**

**ANSWER AND RESPONSE TO UST'S  
MOTION FOR ORDER COMPELLING DEBTOR  
TO FILE SCHEDULES AND STATEMENTS**

COMES NOW Lady Forest Farms (the "Debtor") and files its answer and response to the *Motion for Order Compelling Debtor to File Schedules and Statements* [DK#73] (the "Motion") filed herein by the United States Trustee ("UST"), and in support thereof would respectfully show as follows, to-wit:

1. Admitted.
2. Admitted.
3. Admitted.

4. Denied. Because of the serious illness and continued hospitalization of the son of Hugh Haralson, the Debtor's representative, Mr. Haralson has been unavailable to assist Debtor's counsel with completion of the schedules and statement of financial affairs in this bankruptcy case. Counsel for the Debtor is unable to access Debtor's computers or other financial records in order to formulate meaningful schedules or statement of financial affairs. Nevertheless, Mr. Haralson will meet with counsel for the Debtor as soon as possible to complete the schedules and statement of financial affairs.

**Last Unnumbered Paragraphs**

The Debtor denies that the UST is entitled to the relief demanded within the last unnumbered paragraphs of the Motion except as noted herein.

WHEREFORE, PREMISES CONSIDERED, Debtor respectfully prays that upon a hearing hereof this Honorable Court will enter its Order denying the Motion and setting a new deadline for the filing of the schedules and statement of financial affairs. Debtor prays for general relief.

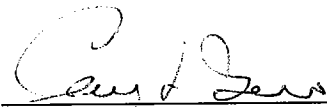
THIS, the 7<sup>th</sup> day of June, 2011.

Respectfully submitted,

LADY FOREST FARMS, INC.

By Its Attorneys

HARRIS JERNIGAN & GENO, PLLC

By:   
Craig M. Geno

OF COUNSEL:

Craig M. Geno; MSB No. 4793  
HARRIS JERNIGAN & GENO, PLLC  
587 Highland Colony Parkway (39157)  
P. O. Box 3380  
Ridgeland, MS 39158-3380  
Telephone No.: 601-427-0048  
Facsimile No.: 601-427-0050

F:\Users\Bankrupt\Forest Packing-Lady Forest\Lady Forest Farms\Pleadings\Answer - UST's Motion - Compel.wpd

**CERTIFICATE OF SERVICE**


I, Craig M. Geno, do hereby certify that I have caused to be served this date, via electronic filing transmission and/or U. S. Mail, postage prepaid, a true and correct copy of the above and foregoing to the following:

Ronald McAlpin, Esq.  
Office of the United States Trustee  
[Ronald.McAlpin@usdoj.gov](mailto:Ronald.McAlpin@usdoj.gov)

Mr. Stephen Smith  
[trustee1@smithcpafirm.com](mailto:trustee1@smithcpafirm.com)

Eileen N. Shaffer, Esq.  
[enslaw@bellsouth.net](mailto:enslaw@bellsouth.net)

THIS, the 7<sup>th</sup> day of June, 2011.

A handwritten signature in cursive script, appearing to read "Craig M. Geno", is written over a horizontal line.

Craig M. Geno